

Appendix Exhibit 28

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 ABBY B. CONLEY, :
4 Plaintiff :
5 v. : Civil Action No. 05-76E
6 COUNTY OF ERIE, ERIE COUNTY :
7 OFFICE OF CHILDREN AND YOUTH, :
8 a/k/a ERIE COUNTY CHILD :
9 WELFARE SERVICE, RICHARD :
10 SCHENKER, individually and :
11 in his capacity as County :
12 Executive of Erie County, :
13 Pennsylvania, PETER CALLAN, :
14 individually and in his :
15 capacity as Erie County :
16 Director of Personnel, DEBRA :
17 LIEBEL, individually and in :
18 her capacity as Executive :
19 Director, Erie County Office :
20 of Children and Youth, a/k/a :
21 Erie County Child Welfare :
22 Service, and JOHN A. ONORATO, :
23 ESQUIRE, individually and in :
24 his capacity as Erie County :
25 Solicitor, :
Defendants :

<p>1 For the Plaintiff: 2 Timothy D. McNair, Esquire 3 821 State Street 4 Erie, PA 16501 5 6 Anthony Angelone, Esquire 7 Vendetti & Vendetti 8 3820 Liberty Street 9 Erie, PA 16509 10 For the County of Erie, Erie County Office of Children and 11 Youth, a/k/a Erie County Child Welfare Service: 12 Neal Devlin, Esquire 13 Knox McLaughlin Gornall & Sennett, PC 14 120 West 10th Street 15 Erie, PA 16501 16 17 For the Defendants Richard Schenker, Peter Callan, and Debra 18 Liebel: 19 Edmund R. Joyal, Jr., Esquire 20 Law Office of Joseph S. Weimer 21 975 Two Chatham Center 22 Pittsburgh, PA 15219 23 For the Defendant John A. Onorato, Esquire: 24 Sara E. Baugh, Esquire 25 Dell Moser Lane & Loughney, LLC Suite 3700 Pittsburgh, PA 15219</p>	<p>Page 2</p> <p>1 MARY JO CLINE S Z E W C Z Y K, first 2 having been duly sworn, testified as follows: 3 4 DIRECT EXAMINATION 5 BY MR. ANGELONE: 6 7 Q. Please state your name for the record. 8 A. Mary Jo Cline Szewczyk, S-Z-E-W-C-Z-Y-K. 9 Q. Married name? 10 A. Yes. I go by my maiden name at work. 11 Q. All right. And I already introduced myself prior 12 to this. 13 A. Um-hum. 14 Q. I'm going to be asking you some questions. I'm 15 not sure if you have ever done a deposition before. 16 A. I have. 17 Q. So you're somewhat familiar with it then? 18 A. Yes. 19 Q. I'm going to be asking you some questions. And 20 one thing I'm going to ask you, first of all, is that you 21 please state your answers verbally so the court reporter can 22 take down everything that you say. Sometimes we have a 23 tendency to nod with our head or -- in responding to a 24 question, and, obviously, she can't really take that down. 25 So if you can make sure all your responses are verbal. And</p>
<p>1 2 3 INDEX 4 TESTIMONY OF MARY JO CLINE 5 Direct examination by Mr. Angelone 4</p>	<p>Page 3</p> <p>1 then also if for some reason you don't understand the 2 question I'm asking you, please tell me or ask me to restate 3 it. Otherwise, I'm going to assume -- if you do answer, I'm 4 going to assume that you did understand the question and 5 that your answer is responsive to that question. Okay? 6 A. Okay. 7 Q. All right. Let's start off with your employment. 8 Where are you currently working? 9 A. Erie County Office of Children and Youth. 10 Q. What is your capacity? In what capacity do you 11 work? 12 A. I'm a casework supervisor. 13 Q. How long have you worked with the Office of 14 Children and Youth? 15 A. I did an internship in September 1983 and was 16 hired in August of '84. 17 Q. You have been there since 1984 -- or 1983? 18 A. Yes. 19 Q. Okay. When did you become a supervisor? 20 A. 1995. 21 Q. And the position that you had in 1995 is the same 22 position that you have today? 23 A. Basically. 24 Q. What has changed in that? 25 A. After being a supervisor eight years, you become a</p>

2 (Pages 2 to 5)

<p style="text-align: right;">Page 6</p> <p>1 senior supervisor. And then through practice areas, I 2 became a clinician as a supervisor. So it's just a little 3 bit elevated.</p> <p>4 Q. All right. For practical purposes do you still 5 perform the same functions as you did in 1995?</p> <p>6 A. Yes.</p> <p>7 Q. The positions that you described -- or the 8 elevated positions that you described, do they have more to 9 do with, I guess, pay structure?</p> <p>10 A. Pay structure, and the clinician also has a 11 specialty that I'm in charge of staff retention. And don't 12 say anything about the current state of things. It's not my 13 fault.</p> <p>14 Q. The staff -- that position, when did you become 15 elevated to that -- clinician?</p> <p>16 A. The summer of '05.</p> <p>17 Q. I'm sure you're familiar with why you're here 18 today.</p> <p>19 A. Yes.</p> <p>20 Q. It has to do with a case -- Attorney McNair and 21 myself represent Abby Conley relative to the circumstances 22 surrounding her termination --</p> <p>23 A. Correct.</p> <p>24 Q. -- from the Office of Children and Youth.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. I guess from what I understand in the Office of 2 Children and Youth, it's broken down into units?</p> <p>3 A. That's correct.</p> <p>4 Q. And would P.W. ever have been in the same unit 5 that you were in?</p> <p>6 A. Yes.</p> <p>7 Q. And if I understand correctly, then, that would 8 have made you her direct supervisor?</p> <p>9 A. Originally we were in the same unit as 10 caseworkers, and then I was promoted, and then I became her 11 supervisor, yes.</p> <p>12 Q. And do you recall for how long a period of time 13 you were her supervisor?</p> <p>14 A. I became her supervisor in December of '95. And I 15 think it was until 2001, maybe, 2002. I'm not positive.</p> <p>16 Q. Okay. What happened in 2001 or 2002 that changed 17 that?</p> <p>18 A. She transferred into a different department.</p> <p>19 Q. A different department or a different unit?</p> <p>20 A. Different unit.</p> <p>21 Q. Okay. But still doing the same type of job that 22 she was doing while she was under your supervision?</p> <p>23 A. Well, the reason I said different department is at 24 that time we had a little bit of a different structure, and 25 that was the placement department. So she transferred to</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. In your capacity as a supervisor, did you have the 2 opportunity to work with Abby Conley?</p> <p>3 A. Yes. I wasn't her direct supervisor, but I -- I 4 knew who she was, yes.</p> <p>5 Q. At any point in time did you act in the capacity 6 as her direct supervisor?</p> <p>7 A. Through the structure of the agency, there's a 8 covering supervisor, so if her direct supervisor would have 9 been out and she needed something, she would come to the 10 covering supervisor, which could have been me, yes.</p> <p>11 Q. Okay. Well, in your capacity as supervisor, and 12 with your familiarity with Abby Conley at work, were you 13 able to at any time, I guess, observe her work performance?</p> <p>14 A. Not directly. I mean, she would come if she had a 15 question that particular day. But I would not have read any 16 of her documents or gotten case reports from her, no.</p> <p>17 Q. Did you ever have the opportunity to work with 18 [P.W.]?</p> <p>19 A. Yes.</p> <p>20 Q. I think we have agreed for purposes of the 21 deposition that I'm going to refer to her by initial, 22 because that's how it's going to be typed out. Okay?</p> <p>23 MR. DEVLIN: Do you understand?</p> <p>24 THE WITNESS: P.W.?</p> <p>25 MR. ANGELONE: P.W., yes.</p>	<p style="text-align: right;">Page 9</p> <p>1 that unit because it's a different kind of case that you're 2 involved in. It's not quite as stressful.</p> <p>3 Q. Okay. And so the unit -- or department that you 4 were in, then, would have been for what?</p> <p>5 A. It's called in-home protective services.</p> <p>6 Q. Is it that she transferred because she wanted to 7 be transferred to a different unit?</p> <p>8 MR. DEVLIN: Object to form. You can answer.</p> <p>9 A. She chose that on her own.</p> <p>10 Q. And in your capacity as her supervisor, you were 11 able to become familiar with her work performance?</p> <p>12 A. Yes.</p> <p>13 Q. With respect to P.W., during the time that you 14 were her supervisor, did you at any time become aware of any 15 complaints about her from any third parties outside the 16 agency?</p> <p>17 A. Yes.</p> <p>18 Q. And did any of these complaints have to do with 19 her conduct?</p> <p>20 A. Yes.</p> <p>21 Q. Would these complaints -- who would these 22 complaints have come from?</p> <p>23 A. One was from -- I believe it was a foster parent, 24 and one was from another service provider.</p> <p>25 Q. There were only two?</p>

3 (Pages 6 to 9)

<p>1 A. That I can recall.</p> <p>2 Q. That you can recall?</p> <p>3 A. That I can specifically recall, yes.</p> <p>4 Q. Okay. And, now, if I understand correctly, this</p> <p>5 is during the time frame between 1995, when she first worked</p> <p>6 under your unit --</p> <p>7 A. Yes.</p> <p>8 Q. -- through 2001 or '2 when she left?</p> <p>9 A. That's correct.</p> <p>10 Q. Can you tell me or describe for me what the</p> <p>11 complaint was from the foster parent.</p> <p>12 A. When a foster child returned to the foster home,</p> <p>13 he had stated some concerns that he had with the caseworker,</p> <p>14 and so the foster mother was calling to report that.</p> <p>15 Q. Okay. What were the concerns?</p> <p>16 A. He said that [P.] slapped him in the face.</p> <p>17 Q. How old was this child?</p> <p>18 A. I really don't remember. I believe nine or 10,</p> <p>19 but I can't swear to it.</p> <p>20 Q. Okay. And was this incident reported to anyone</p> <p>21 else?</p> <p>22 A. Yes.</p> <p>23 Q. Who would that have been reported to?</p> <p>24 A. My direct supervisor.</p> <p>25 Q. Who would that have been at the time?</p>	<p>Page 10</p> <p>1 him by the face and slapped him on the face.</p> <p>2 Q. Did anyone witness that; grabbing by the face and</p> <p>3 slapping the face?</p> <p>4 A. The mother and the siblings and the child. That's</p> <p>5 why I spoke to them.</p> <p>6 Q. Okay. And after you did your investigation --</p> <p>7 well, did you report it to your supervisor before or after</p> <p>8 you did that investigation?</p> <p>9 A. I reported it immediately when I got the phone</p> <p>10 call.</p> <p>11 Q. And then did you report also the findings from</p> <p>12 your investigation to your supervisor?</p> <p>13 A. Yes, I did.</p> <p>14 Q. And do you know, was there any other action that</p> <p>15 was taken? Or what action was taken, I guess, to P.W. as a</p> <p>16 result of this?</p> <p>17 A. She was given a letter of reprimand.</p> <p>18 Q. Was she suspended or anything?</p> <p>19 A. She was not suspended.</p> <p>20 Q. Was the Department of Public Welfare notified of</p> <p>21 this?</p> <p>22 A. There was no injury, and, therefore, they were not</p> <p>23 notified. They are notified when there's an injury.</p> <p>24 Q. Am I correct that if there is a letter of</p> <p>25 reprimand that's put in a worker's file, that it eventually</p>
<p>1 A. Cheryl Bates.</p> <p>2 Q. She's no longer there?</p> <p>3 A. That's correct.</p> <p>4 Q. Was there any type of an investigation done about</p> <p>5 that?</p> <p>6 A. I did an investigation.</p> <p>7 Q. And what did that consist of?</p> <p>8 A. I spoke to the alleged victim, his siblings, and</p> <p>9 his mother, because this allegedly occurred during</p> <p>10 visitation.</p> <p>11 Q. Okay. Did anyone witness that?</p> <p>12 A. The people that I --</p> <p>13 MR. DEVLIN: Object. Object to form. Go ahead.</p> <p>14 Q. Well, let me ask you this way: What did the</p> <p>15 investigation turn out?</p> <p>16 A. I'm not sure what you're asking.</p> <p>17 Q. Well, you said you investigated by speaking to the</p> <p>18 various individuals.</p> <p>19 A. Yes.</p> <p>20 Q. And I'm just wondering what it is that you learned</p> <p>21 in the course of investigating and speaking with these</p> <p>22 people.</p> <p>23 A. The family was consistent in stating that P.W.</p> <p>24 removed the child from the visitation room -- you know, took</p> <p>25 him by the arm, took him out of the room, and had grabbed</p>	<p>Page 11</p> <p>1 becomes expunged?</p> <p>2 A. When a worker is given a letter of reprimand, it</p> <p>3 goes in the file for one year. If there's no repeat offense</p> <p>4 of that letter, you know, the reason for that letter, then,</p> <p>5 yes, it's expunged from the personnel file.</p> <p>6 Q. And do you recall the time frame that this</p> <p>7 happened a little bit more specifically than -- I don't</p> <p>8 know, than between 1995 and 2001?</p> <p>9 A. I believe -- I think it would have been about</p> <p>10 1998, '99, somewhere in there.</p> <p>11 Q. Did you discuss the incident with P.W.?</p> <p>12 A. Yes.</p> <p>13 Q. And were you the one that gave her the written</p> <p>14 reprimand?</p> <p>15 A. Yes.</p> <p>16 Q. You also indicated, I believe, that there was a</p> <p>17 service provider?</p> <p>18 A. That's correct.</p> <p>19 Q. That also had a complaint?</p> <p>20 A. Yes.</p> <p>21 Q. And do you remember the time frame that that</p> <p>22 complaint came in?</p> <p>23 A. That was after the first, so '99, 2000.</p> <p>24 Q. Going back to the slapping incident that you</p> <p>25 described, did the victim at any point recant that that</p>

<p style="text-align: right;">Page 14</p> <p>1 happened?</p> <p>2 A. No.</p> <p>3 Q. Was she eventually taken off of that unit that she</p> <p>4 was working at with that family?</p> <p>5 MR. DEVLIN: Object --</p> <p>6 MR. ANGELONE: Yeah, let me rephrase that, because</p> <p>7 it didn't come out right.</p> <p>8 Q. Was she taken off of that family or that child --</p> <p>9 that particular case after that happened?</p> <p>10 A. To the best of my recollection, she was.</p> <p>11 Q. Okay. Now, going to this other service provider</p> <p>12 you indicated, which provider would it have been?</p> <p>13 A. Sarah Reed.</p> <p>14 Q. And what was the nature of that complaint?</p> <p>15 A. They had a child that was at their school with a</p> <p>16 hand print, and when they questioned the mother regarding</p> <p>17 that, she stated that she had notified P.W. the previous</p> <p>18 night or the day before saying that she had slapped the</p> <p>19 child and left this mark and that P.W. told her to put ice</p> <p>20 on it and don't send the child to school the next day.</p> <p>21 Q. Do you remember roughly how old the child was?</p> <p>22 A. I'm guessing five or six. I wouldn't swear to it,</p> <p>23 but around that age.</p> <p>24 Q. And did you investigate that?</p> <p>25 A. It wasn't -- I mean, I talked to P.W. about it to</p>	<p style="text-align: right;">Page 16</p> <p>1 mother?</p> <p>2 A. The mother told the agency that she had contacted</p> <p>3 P.W.</p> <p>4 Q. Right.</p> <p>5 A. And when they asked what she was told, they</p> <p>6 said -- she said that P.W. told her to put ice on the injury</p> <p>7 and not to send the child to school the next day.</p> <p>8 Q. Okay. Did the mother imply that P.W. did that?</p> <p>9 A. No.</p> <p>10 Q. Was there any indication as to where -- or what</p> <p>11 caused the hand print? Was it from the mother?</p> <p>12 A. From the mother. Absolutely.</p> <p>13 Q. All right. And so you discussed this with P.W.</p> <p>14 because she did not report it?</p> <p>15 A. Absolutely. Yes, that's it.</p> <p>16 Q. So I'm trying to understand, though, what's the</p> <p>17 nature of the complaint from Sarah Reed with respect to</p> <p>18 P.W.'s conduct?</p> <p>19 A. Violation of the mandated reporter law.</p> <p>20 Q. Okay. Going back to the incident with the foster</p> <p>21 parent and the child that was slapped --</p> <p>22 A. Yes.</p> <p>23 Q. -- did she admit doing that when you talked to</p> <p>24 her?</p> <p>25 A. She said that she may have grabbed his face to get</p>
<p style="text-align: right;">Page 15</p> <p>1 see if that actually -- yes.</p> <p>2 Q. When you talked to her about it, did she deny that</p> <p>3 it happened?</p> <p>4 A. No.</p> <p>5 Q. Did she admit that it happened?</p> <p>6 A. She admitted that it happened, but she did not</p> <p>7 feel that she was a mandated reporter at that time, because</p> <p>8 it wasn't an active case for her and because it was during</p> <p>9 the evening.</p> <p>10 Q. Let me ask -- I'm just not sure I understand what</p> <p>11 the allegation was. You heard from Sarah Reed or --</p> <p>12 A. Um-hum.</p> <p>13 Q. -- someone from Sarah Reed, correct --</p> <p>14 A. Um-hum.</p> <p>15 Q. -- that a mother contacted Sarah Reed?</p> <p>16 A. Sarah Reed contacted the mother.</p> <p>17 Q. Okay. The mother. Because the child had an</p> <p>18 imprint?</p> <p>19 A. A hand print, yes.</p> <p>20 Q. A hand print on his or her face?</p> <p>21 A. Yes.</p> <p>22 Q. So Sarah Reed contacted the mother to question</p> <p>23 where the hand print came from?</p> <p>24 A. Right.</p> <p>25 Q. And the mother -- what was the response from the</p>	<p style="text-align: right;">Page 17</p> <p>1 his attention and might have just lightly tapped him to get</p> <p>2 his attention (indicating).</p> <p>3 Q. But when you investigated it, you didn't</p> <p>4 understand it to be a light tap, did you?</p> <p>5 MR. DEVLIN: Object to form. You can answer.</p> <p>6 A. There was no injury.</p> <p>7 Q. Well, was the injury described to you by, for</p> <p>8 example, the foster parent?</p> <p>9 A. Not by the foster parent. She wasn't there.</p> <p>10 Q. Then by other witnesses.</p> <p>11 A. Everyone consistently said she grabbed him by the</p> <p>12 face and slapped him.</p> <p>13 Q. Slapped him on both sides?</p> <p>14 A. See -- well, she said, I may have slapped him to</p> <p>15 get his attention (indicating). The other kid just said the</p> <p>16 one side. The child said one side.</p> <p>17 Q. And there was no mark or no injury.</p> <p>18 A. That's correct.</p> <p>19 Q. Now, taking you out of this time frame between</p> <p>20 1999 and 2001 or 2002 when you were her direct supervisor --</p> <p>21 A. Yes.</p> <p>22 Q. -- were you aware of any other incidents or any</p> <p>23 other complaints about P.W. while she was employed with OCY?</p> <p>24 A. The only other complaints that came directly to me</p> <p>25 were by the Court for her attire. That's the only thing</p>

<p style="text-align: right;">Page 18</p> <p>1 that I can say that came directly to me.</p> <p>2 Q. Okay. But other complaints indirectly to you?</p> <p>3 You've heard of other complaints, haven't you?</p> <p>4 MR. DEVLIN: Object to form. You can answer.</p> <p>5 A. About her attitude.</p> <p>6 Q. Okay. And would I be correct in saying that</p> <p>7 complaints about her attitude would have been pretty</p> <p>8 consistent throughout the time that she worked with OCY?</p> <p>9 A. I would say that they escalated after the time of</p> <p>10 her son's death.</p> <p>11 Q. Do you know what time frame that was that that</p> <p>12 happened?</p> <p>13 A. It was November 6th of '01 or '02. I'm not</p> <p>14 positive. It's been five or six years.</p> <p>15 Q. With respect to her not reporting the incident</p> <p>16 with Sarah Reed that you described --</p> <p>17 A. Yes.</p> <p>18 Q. -- was she reprimanded for that in any way?</p> <p>19 A. Yes.</p> <p>20 Q. What was the nature of that reprimand?</p> <p>21 A. It was a verbal -- or written reprimand. I'm</p> <p>22 sorry.</p> <p>23 Q. Okay. No suspension involved with that, right?</p> <p>24 A. Right.</p> <p>25 Q. Now, have you heard either directly or indirectly</p>	<p>1 for her clients?</p> <p>2 A. Not while I supervised her.</p> <p>3 Q. Okay. Did you hear of any such complaints after</p> <p>4 you supervised her, when you were no longer supervising her?</p> <p>5 A. I mean, there was always talk about things that</p> <p>6 were going on, but nobody called me directly, no.</p> <p>7 Q. Okay. And I understand. I mean, through that</p> <p>8 talk, though, did you hear that there were complaints about</p> <p>9 her not attending visits on a regular basis, for example?</p> <p>10 A. I don't know specifically about whether it was</p> <p>11 visits, but mostly her attitude had definitely changed.</p> <p>12 Q. What about her attitude?</p> <p>13 A. She was shorter. She --</p> <p>14 Q. You mean a short fuse, for lack of a better --</p> <p>15 A. Yeah. Not as patient. It was more of a job at</p> <p>16 that point than a commitment to Children and Youth. That's</p> <p>17 just my opinion.</p> <p>18 Q. That's what you saw or what you -- you felt, I</p> <p>19 guess.</p> <p>20 A. Yes.</p> <p>21 Q. How about with respect to her keeping notes? For</p> <p>22 example, logging in things that have to do with her visits,</p> <p>23 for example, or client contacts.</p> <p>24 A. She kept them while she was under me.</p> <p>25 Q. She did?</p>
<p style="text-align: right;">Page 19</p> <p>1 of any other allegations about P.W. striking or hitting a</p> <p>2 child or improperly grabbing a child?</p> <p>3 A. I read it in the paper.</p> <p>4 Q. Okay. What did you read in the paper?</p> <p>5 A. That Miss Conley made allegations that Miss [W.]</p> <p>6 slapped a child.</p> <p>7 Q. You didn't hear anything about it when you were in</p> <p>8 the agency, like through work, through discussions with</p> <p>9 anyone?</p> <p>10 A. Not really.</p> <p>11 Q. First time you heard it, then, would be when it</p> <p>12 was in the paper?</p> <p>13 A. To the -- to the best of my recollection.</p> <p>14 Q. During the time that you were her supervisor, you</p> <p>15 were also familiar with her attendance at work. Would that</p> <p>16 be right?</p> <p>17 A. Yes.</p> <p>18 Q. Did she have good attendance at work?</p> <p>19 A. I believe so.</p> <p>20 Q. Were there ever any complaints about her</p> <p>21 attendance for visitations or supervised visitations?</p> <p>22 Anything to that effect?</p> <p>23 A. Not that I recall. Nothing that sticks out.</p> <p>24 Q. Okay. There's no complaints that she didn't show</p> <p>25 up for visits or that -- say that; didn't show up for visits</p>	<p style="text-align: right;">Page 21</p> <p>1 A. Yes.</p> <p>2 Q. Did that change at any point after that?</p> <p>3 A. I wouldn't know.</p> <p>4 Q. Did you talk to P.W. even after you were no longer</p> <p>5 her supervisor from time to time?</p> <p>6 A. Yes.</p> <p>7 Q. And at any time during those discussions, after</p> <p>8 you were no longer her supervisor, did she discuss with you</p> <p>9 or mention Abby Conley?</p> <p>10 A. I believe maybe once or twice.</p> <p>11 Q. Okay. What was the nature of those discussions?</p> <p>12 A. That Miss Conley was out to get her.</p> <p>13 Q. And that's what P.W. told you, that Miss Conley</p> <p>14 was out --</p> <p>15 A. My summation of it, yeah, basically.</p> <p>16 Q. On both of those occasions?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Did she tell you why she felt that or where</p> <p>19 she was getting that --</p> <p>20 A. That was after it was in the paper.</p> <p>21 Q. That's after it was in the paper?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Would that be after Miss Conley was fired?</p> <p>24 A. I think that's when it came out in the paper,</p> <p>25 where P.W.'s name -- I think it was after Abby's</p>

<p>1 termination.</p> <p>2 Q. Okay. Did you at any time also supervise Deanna</p> <p>3 Cosby?</p> <p>4 A. Not directly.</p> <p>5 Q. Not directly?</p> <p>6 A. No.</p> <p>7 Q. Were you familiar with Deanna Cosby's work</p> <p>8 performance?</p> <p>9 A. Again, only as the covering supervisor capacity.</p> <p>10 Q. And based on that, to the best of your knowledge,</p> <p>11 how would you describe her work?</p> <p>12 A. Again, that would be very brief, like interludes.</p> <p>13 Maybe she needed something signed, maybe I would look over a</p> <p>14 letter, something. But I can't really judge her performance</p> <p>15 on that.</p> <p>16 Q. Going back to Miss Conley, are you aware of any</p> <p>17 reports that would -- that were made about her work</p> <p>18 performance that were negative?</p> <p>19 A. Prior to her termination, no.</p> <p>20 Q. Did you hear of, I guess, any compliments or</p> <p>21 anything of that nature about Miss Conley's work performance</p> <p>22 prior to termination?</p> <p>23 A. Well, I thanked her for helping me on fundraisers</p> <p>24 and whatnot. She was helpful to me. I don't know if there</p> <p>25 were other specifics or not.</p>	<p>Page 22</p> <p>1 Q. Okay. You don't know the nature of the problems,</p> <p>2 or do you?</p> <p>3 A. I can't recall specifically. I think that she</p> <p>4 even talked to me about them at one point, that she had some</p> <p>5 concerns.</p> <p>6 Q. Okay. Prior to termination on September 10, 2004,</p> <p>7 did you hear anyone in the agency talk about terminating</p> <p>8 her?</p> <p>9 A. Just the day of -- of -- the day that she</p> <p>10 resigned. They said -- they called an emergency meeting,</p> <p>11 all supervisors and admins. in the building were to attend,</p> <p>12 and we were told that she was given the option at that</p> <p>13 particular moment that we were meeting to either resign or</p> <p>14 she would be terminated. And I believe it was a Friday. I</p> <p>15 can't recall with certainty. But they wanted us to know</p> <p>16 that because it would probably hit the papers.</p> <p>17 Q. Okay. So if I understand correctly, the same time</p> <p>18 that she was being terminated, there was a supervisors'</p> <p>19 meeting pretty much at the same time on that Friday?</p> <p>20 A. Supervisors and administrators, yes.</p> <p>21 Q. And administrators. Who were the administrators</p> <p>22 present at that meeting?</p> <p>23 A. I think Debi Liebel called it. I think Colleen</p> <p>24 Locke was there.</p> <p>25 Q. Did they give you any indication why they thought</p>
<p>Page 23</p> <p>1 Q. Prior to June of 2004, okay -- try to remember</p> <p>2 this time frame. And I'll kind of lay it out for you.</p> <p>3 Miss Conley was terminated on September 10, 2004. Okay?</p> <p>4 A. Yes.</p> <p>5 Q. So do you recall any discussions within the agency</p> <p>6 about concerns about Abby Conley or her work -- in her work</p> <p>7 performance or in any manner prior to her termination?</p> <p>8 A. No. Maybe not. I just thought of something.</p> <p>9 Q. Okay.</p> <p>10 A. When she was switching supervisors, there had been</p> <p>11 some concern --</p> <p>12 Q. Which supervisors? Do you remember?</p> <p>13 A. I -- I think she went from Tony DeJohn to</p> <p>14 Miss Deveney.</p> <p>15 Q. Miss Deveney?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. So you heard some concerns surrounding</p> <p>18 that?</p> <p>19 A. Yeah, but I can't even say specifically. I just</p> <p>20 know that there was talk around that time, and that she</p> <p>21 needed to be moved and who would take her kind of thing.</p> <p>22 Q. Do you remember at whose request that move was, or</p> <p>23 anything?</p> <p>24 A. I think it may have been mutual, but I know that</p> <p>25 Miss Conley was having some problems there as well.</p>	<p>Page 25</p> <p>1 it would hit the papers?</p> <p>2 A. If they did, I don't recall. I just remember, you</p> <p>3 know, being called up there and them saying that Abby was on</p> <p>4 her way to the courthouse or was at the courthouse being</p> <p>5 given an option to resign or she would be terminated.</p> <p>6 Q. Did they during that meeting indicate why this was</p> <p>7 happening?</p> <p>8 A. I don't think they did.</p> <p>9 (Discussion held off the record.)</p> <p>10 Q. And I guess in the same vein, nobody asked why is</p> <p>11 she being terminated or given that option to resign? That</p> <p>12 didn't come up in the meeting?</p> <p>13 A. It was more of an informed -- informational thing.</p> <p>14 They came in and said blah, blah, blah, blah, blah, and</p> <p>15 you're free to go.</p> <p>16 Q. Okay. Who ran the meeting?</p> <p>17 A. I believe it was Debi.</p> <p>18 Q. You believe it was Deb Liebel?</p> <p>19 A. I believe so.</p> <p>20 Q. Okay. You think it was a Friday. Then after that</p> <p>21 happened, okay, did anyone from the agency come to you and</p> <p>22 ask you about -- any information about Abby Conley?</p> <p>23 A. Did anyone from the agency ask me specifically</p> <p>24 information about Abby?</p> <p>25 Q. Yes.</p>

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1 A. No.	1 to lose her job. And that the Judge instructed her to say
2 Q. Okay. And I'm including with that the solicitors;	2 whatever she needed to say and assured her she wouldn't lose
3 Mike Cauley, Attorney Allgeier.	3 her job. That's what I heard.
4 A. Right. I mean, there was gossip, but nobody came	4 Q. Okay. Who did you hear that from?
5 and asked me directly anything, no.	5 A. I don't even know for sure. I mean, it was just
6 Q. Do you recall a supervisors' meeting sometime in	6 going.
7 that time frame where Pete Callan was also present?	7 Q. All right. Do you recall what she testified
8 A. He -- he did attend one or two of the meetings. I	8 about?
9 believe it was after that date, though.	9 A. I don't know if that's the point where the kid got
10 Q. Right. After the 10th of November, 2004.	10 slapped or not. I'm not sure. Oh, no, wait. No, I do
11 A. Yes.	11 know. That Miss Deveney changed her court summary from
12 Q. Do you remember a remark being made by him;	12 something favorable to nonfavorable.
13 something to the effect that they got her, that they got	13 Q. Okay. And you recall hearing that from other
14 Abby, that they finally got Abby?	14 people in the agency?
15 A. Not that I recall.	15 A. Yes.
16 Q. You don't remember him making any kind of a remark	16 Q. Let me ask you this with respect to court
17 like that?	17 summaries: If a caseworker working under you would prepare
18 A. I truly -- I don't.	18 a court summary --
19 Q. Okay. I'm going to backtrack just a little bit	19 A. Yes.
20 here. When we talked about Abby Conley leaving Tony -- I	20 Q. -- would you review that?
21 think it's Tony DeJohn's unit.	21 A. Yes.
22 A. Yes.	22 Q. Is that part of your job?
23 Q. Do you remember whether Miss Conley was	23 A. Yes.
24 complaining that the caseworkers -- she was having trouble	24 Q. Would it also be your job to review case aides'
25 because the caseworkers were not servicing their cases? Do	25 court summaries as well?
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1 you remember that being one of the complaints that she had?	1 A. Yes.
2 A. I -- I believe it was.	2 Q. When you did receive a court summary prepared by a
3 Q. Do you recall at any point in time Miss Conley	3 case aide on a particular case --
4 complaining that P.W. wasn't servicing some of the cases	4 A. Yes.
5 that she was working on in 2004?	5 Q. -- at that time, let's say 2004, did you have the
6 A. I -- I don't recall that.	6 authority to make changes to those?
7 Q. Okay. Did Miss Conley ever talk to you about	7 A. Yes.
8 P.W.?	8 Q. What is your understanding about the changes that
9 A. I really don't remember.	9 you were permitted to make to these court summaries?
10 Q. Do you recall ever being asked for notes that you	10 A. Well, I would make changes so that they looked
11 may have kept regarding Miss Conley?	11 more professional as far as structure, grammar, spelling,
12 A. I never kept any notes regarding Miss Conley, so	12 punctuation, that kind of stuff.
13 there would have been nothing to ask for.	13 Q. Okay. Did you understand that you also had the
14 Q. Okay. Do you remember being asked if you had	14 ability to delete or remove opinions or observations that
15 any -- any types of notes or anything regarding Miss Conley?	15 were made by the case aide?
16 A. No.	16 MR. DEVLIN: You're asking both opinions --
17 Q. Prior to her termination on September 10, 2004, do	17 Q. Let's take opinions first.
18 you recall any discussion in the agency about Miss Conley's	18 A. If the caseworker and I did not have the same
19 testimony at a hearing that occurred in July of 2004?	19 opinion, we would discuss it and decide how to proceed from
20 A. Yes.	20 there.
21 Q. And what was it that you had heard?	21 Q. Okay. I'm talking about the case aide. You say
22 A. That she was at a hearing, that -- I believe it	22 the caseworker.
23 was the first hearing. That someone from the press had been	23 A. Same -- same thing. I'm sorry.
24 there. And that out of nowhere, she started crying, was	24 Q. I just want to make sure that we're using that
25 holding the Bible, and saying she was afraid she was going	25 interchangeably.

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<p>1 A. Yes.</p> <p>2 Q. So if you didn't agree with an opinion a case aide</p> <p>3 or a caseworker made, you would discuss it with that person?</p> <p>4 A. That is correct.</p> <p>5 Q. And then based on that discussion, hopefully you</p> <p>6 would come with a resolution with respect to how that end</p> <p>7 product would be.</p> <p>8 A. Right.</p> <p>9 Q. Right? Would you ever -- would you ever simply</p> <p>10 take it upon yourself to remove information such as opinions</p> <p>11 without discussing it with the caseworker?</p> <p>12 A. No.</p> <p>13 Q. Did you feel that that would be appropriate or</p> <p>14 inappropriate?</p> <p>15 A. It would be inappropriate.</p> <p>16 Q. It's inappropriate?</p> <p>17 A. Yes.</p> <p>18 Q. Are you aware of the allegations that Miss Conley</p> <p>19 made that Miss Deveney made changes to her court summary?</p> <p>20 A. Yes, I'm sure.</p> <p>21 Q. Where did you -- I mean, where did you first hear</p> <p>22 of that type of allegation?</p> <p>23 A. In the hallway, I'm sure. Just office gossip.</p> <p>24 Q. Did you ever discuss that with Miss Deveney?</p> <p>25 A. She -- she denies it.</p>	<p>1 Corry, so she will e-mail me her things.</p> <p>2 Q. But as far as here locally, you don't do that?</p> <p>3 A. Depends on -- like I said, a few people will type</p> <p>4 their own things. I have gotten one or two electronically</p> <p>5 if I was on supervisor coverage.</p> <p>6 Q. So you would get those through e-mail?</p> <p>7 A. Occasionally.</p> <p>8 Q. You wouldn't specifically request it be done that</p> <p>9 way.</p> <p>10 A. Oh, no. I did read one of Abby's court summaries,</p> <p>11 now that I recall. I did read one. You asked me that</p> <p>12 question earlier, and I do recall doing it.</p> <p>13 Q. Okay.</p> <p>14 A. I mean, I made a lot of corrections, but they</p> <p>15 were, like I said, spelling or just changing the wording to</p> <p>16 make the sentence run more --</p> <p>17 Q. Sounds to me that that would be typical, I guess,</p> <p>18 with the types of changes you would make with any court</p> <p>19 summary.</p> <p>20 A. That's correct.</p> <p>21 Q. Did P.W. ever express to you that she did not want</p> <p>22 to work with Miss Conley?</p> <p>23 A. Only after the allegations were made that she had</p> <p>24 hit someone by Miss Conley.</p> <p>25 Q. Did P.W. ever discuss that allegation with you?</p>
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<p>1 Q. That did come up in discussion between you and</p> <p>2 her?</p> <p>3 A. She was discussing what was happening and said</p> <p>4 that she didn't do it, yes.</p> <p>5 Q. So she denies that it happened?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. As part of the practice also in obtaining</p> <p>8 and reviewing summaries from a case aide or caseworker, how</p> <p>9 would they do that? Strike that. Was it common practice</p> <p>10 that the case aide or caseworker would e-mail the summary to</p> <p>11 you?</p> <p>12 A. Not in my unit. My workers don't type their own.</p> <p>13 Q. So then someone else types them?</p> <p>14 A. Yes.</p> <p>15 Q. In other words, they are dictated by the workers?</p> <p>16 A. Dictated either through a Dictaphone or</p> <p>17 handwritten and typed by the secretary.</p> <p>18 Q. So then you would actually get a hard copy.</p> <p>19 A. Yes.</p> <p>20 Q. They would not be sent to you through the</p> <p>21 computer?</p> <p>22 A. Generally not, no.</p> <p>23 Q. You say "generally not". Are there exceptions to</p> <p>24 that?</p> <p>25 A. I'm the Corry supervisor, and I have one worker in</p>	<p>1 A. Not specifically.</p> <p>2 Q. Not specifically?</p> <p>3 A. Maybe just, you know, that she was making</p> <p>4 allegations. She never told me specifically what they were.</p> <p>5 Q. Did P.W. ever tell you that she -- that it ever</p> <p>6 happened?</p> <p>7 A. I don't recall whether she did or not.</p> <p>8 Q. She didn't tell you -- she didn't admit to you</p> <p>9 that it did happen? Would that be --</p> <p>10 A. No.</p> <p>11 Q. If, hypothetically speaking -- I'm going to pose a</p> <p>12 hypothetical here. If a caseworker informed you that she</p> <p>13 learned that a case aide may have told a third party about a</p> <p>14 prognostic detention order, okay, what would you do with</p> <p>15 that information?</p> <p>16 MR. DEVLIN: Object to form. Calls for</p> <p>17 speculation. You can answer.</p> <p>18 A. It depends on the basis for the prognostic -- it</p> <p>19 would go case by case, because sometimes I inform the</p> <p>20 clients that we have a prognostic detention order; we're</p> <p>21 taking your child when the baby is born. I will inform them</p> <p>22 if I can. The only time I wouldn't inform them is if I was</p> <p>23 afraid they were going to abscond, and that would put the</p> <p>24 child at risk. So I guess it would have been whether or not</p> <p>25 that child was at risk, if the parents were informed.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. Okay. So if I understand correctly, then, the 2 prognostic detention orders --</p> <p>3 A. Yes.</p> <p>4 Q. -- are not always confidential.</p> <p>5 MR. DEVLIN: Object to form. You can answer.</p> <p>6 A. Correct.</p> <p>7 Q. As I understand, there are times that you actually 8 do tell parents that the prognostic detention order is going 9 to be issued.</p> <p>10 A. Yes.</p> <p>11 Q. Would I -- I guess my question is, aren't these 12 orders issued because you fear that there is a danger to the 13 child?</p> <p>14 MR. DEVLIN: Object to form. Go ahead.</p> <p>15 A. It depends whether the danger is that they are 16 going to abscond and take off and have this child somewhere 17 elsewhere where we're not going to be able to know where the 18 child is -- I mean, I just told somebody, you know, recently 19 that we're going to take your child at birth because you're 20 still doing drugs and you won't stop taking them, and she 21 refuses to, so she knows when she has this baby, that we're 22 taking it.</p> <p>23 Q. Do you know if that is generally the practice in 24 the agency?</p> <p>25 MR. DEVLIN: Object to form. Go ahead.</p>	<p style="text-align: right;">Page 36</p> <p>1 could be a family friend, somebody that the child is 2 familiar with.</p> <p>3 Q. Familiar with, okay. Is that part of the -- a 4 detention order or is that a separate type of a --</p> <p>5 A. Well, we can detain into a kinship home if we know 6 that there would be one available.</p> <p>7 Q. Okay. When you do have an order for kinship 8 placement, are those secret or confidential?</p> <p>9 A. Generally not.</p> <p>10 Q. Is it something that the parent would be made 11 aware of?</p> <p>12 MR. DEVLIN: Object to form. Go ahead.</p> <p>13 A. Usually. That's why we use kinship, so that they 14 can maintain a relationship with their natural family.</p> <p>15 Q. Okay. Are you familiar with Carla Crott?</p> <p>16 A. Yes.</p> <p>17 Q. Who would she be?</p> <p>18 A. Administrator of foster care and placement 19 services.</p> <p>20 Q. Okay. Is she an employee in OCY?</p> <p>21 A. Yes.</p> <p>22 Q. Do you recall at any point whether she asked you 23 if you had any notes, if you kept any notes regarding 24 Miss Conley about a conflict that you had with her in 2001?</p> <p>25 A. Not that I recall.</p>
<p style="text-align: right;">Page 35</p> <p>1 A. I don't know. I would hope that it would be. In 2 my unit, it is.</p> <p>3 Q. If I understand correctly, I mean, I think what 4 you're saying is that parents do have the right to know 5 about the detention orders at times.</p> <p>6 MR. DEVLIN: Object to form. You can answer, if 7 you can.</p> <p>8 A. Correct.</p> <p>9 Q. Are you familiar with an order for kinship 10 placement?</p> <p>11 A. Yeah.</p> <p>12 Q. What does that mean?</p> <p>13 A. A kinship placement?</p> <p>14 Q. Um-hum.</p> <p>15 A. I guess it depends on if it's an emergency kinship 16 placement or not. If it's an emergency kinship placement, 17 we can go out to a home, do a walk-through, make sure it's 18 clean and appropriate, no safety hazards, do a criminal 19 check and a Child Line check on all adult members of the 20 household. If they come back clean, we can place the child 21 in that home that day with the Court's approval, pending a 22 completed kinship study, which can take up to 60 days to 23 complete.</p> <p>24 Q. And kinship meaning a relative?</p> <p>25 A. Doesn't necessarily have to be a relative. It</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. You don't recall being asked that by her?</p> <p>2 A. No.</p> <p>3 Q. Did -- and I may have asked this already. But 4 after Miss Conley was terminated, were you asked by anyone 5 in the agency, including the solicitors, whether or not you 6 had any information with respect to anything that 7 Miss Conley did at work? Anything at all?</p> <p>8 MR. DEVLIN: Object to form. You can answer.</p> <p>9 A. I was not asked.</p> <p>10 Q. You weren't approached by anyone.</p> <p>11 A. No.</p> <p>12 Q. I understand that there's a new director there 13 currently. Is that right?</p> <p>14 A. That's right.</p> <p>15 Q. That would be Mr. Lucht?</p> <p>16 A. Yes.</p> <p>17 Q. Do you recall having any meetings with Mr. Lucht, 18 either you -- just you or in conjunction with other 19 supervisors regarding changes to court summaries?</p> <p>20 A. I -- I don't know if it was -- I don't believe it 21 was a meeting. We got a policy that we are to make no 22 changes.</p> <p>23 Q. You got a written policy --</p> <p>24 A. Yes.</p> <p>25 Q. -- sent to you by Mr. Lucht?</p>

<p style="text-align: right;">Page 38</p> <p>1 A. Yes.</p> <p>2 Q. He indicated that you were to make no changes to</p> <p>3 court summaries?</p> <p>4 A. That's correct.</p> <p>5 Q. Do you know what prompted that policy change?</p> <p>6 A. Well, the speculation was that it was over</p> <p>7 Miss Conley's case, but we don't know that for -- I don't</p> <p>8 know that for sure.</p> <p>9 Q. Okay. Was there any discussion with other people</p> <p>10 in the agency about why that might have happened?</p> <p>11 A. Well, that was the -- that was the speculation on</p> <p>12 why it happened.</p> <p>13 Q. Okay. Do you know if Mr. Lucht conducted any kind</p> <p>14 of an investigation to find out whether or not there were</p> <p>15 changes made to that court summary?</p> <p>16 MR. DEVLIN: You're asking specifically with</p> <p>17 respect to the court summary that --</p> <p>18 MR. ANGELONE: Miss Conley's.</p> <p>19 A. Not that I'm aware.</p> <p>20 Q. You're not aware of any investigation that</p> <p>21 Mr. Lucht conducted, I guess within the agency, with respect</p> <p>22 to changes in court summaries that would be made by</p> <p>23 supervisors in general?</p> <p>24 A. I think he may have asked me what my practice was.</p> <p>25 And my practice is that we both have to live with ourselves,</p>	<p style="text-align: right;">Page 40</p> <p>1 dressed inappropriately for court, but those are the ones</p> <p>2 that stick out.</p> <p>3 Q. And besides those, you're not aware of any other</p> <p>4 complaints that have come in about P.W. from anyone outside</p> <p>5 the agency?</p> <p>6 A. Not first-hand knowledge. We hear the rumor</p> <p>7 mills, but I don't have first-hand knowledge of that.</p> <p>8 Q. Okay. You say through rumor. You mean through</p> <p>9 other employees that work there?</p> <p>10 A. That's correct.</p> <p>11 Q. Give me an idea of what types of rumors these</p> <p>12 might be.</p> <p>13 A. That foster parents were complaining about her.</p> <p>14 Q. And do you know what the nature of the complaints</p> <p>15 were?</p> <p>16 MR. DEVLIN: Object to form. You can answer.</p> <p>17 A. The only one that I can remember specifically is</p> <p>18 about her being rude.</p> <p>19 Q. And that's the only one you can remember</p> <p>20 specifically.</p> <p>21 A. Specifically.</p> <p>22 Q. Okay. Any complaints from outside agencies?</p> <p>23 A. Probably the same; that she's -- she was rude.</p> <p>24 Unprofessional.</p> <p>25 (Discussion held off the record.)</p>
<p style="text-align: right;">Page 39</p> <p>1 so if we don't have the same opinion, I write one, they</p> <p>2 write one, and both go over.</p> <p>3 Q. Okay. P.W. no longer works with OCY; is that</p> <p>4 correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Do you have any knowledge or understanding as to</p> <p>7 why she's not there anymore?</p> <p>8 A. She applied for a new position and obtained it.</p> <p>9 Q. And that's all you know about?</p> <p>10 A. I don't --</p> <p>11 Q. The circumstances surrounding her leaving OCY.</p> <p>12 A. I know that she was frustrated with the agency and</p> <p>13 casework in general and needed a change, according to her.</p> <p>14 Q. Is that something she told you?</p> <p>15 A. Yes.</p> <p>16 Q. As far as you know, she was not asked to leave the</p> <p>17 agency?</p> <p>18 A. As far as I know.</p> <p>19 Q. Were there any other acts or any other conduct by</p> <p>20 P.W. during the time that you knew her in the agency that,</p> <p>21 in your opinion, would be inappropriate?</p> <p>22 MR. DEVLIN: Object to form. You can answer.</p> <p>23 A. I don't recall them. I do -- like I said, I do</p> <p>24 recall those two specific instances where I disciplined her,</p> <p>25 and I do recall two phone calls from the Judge saying she</p>	<p style="text-align: right;">Page 41</p> <p>1 (Recess held from 2:35 p.m. till 2:41 p.m.)</p> <p>2 Q. I want to ask you a few questions on the computer</p> <p>3 usage at OCY.</p> <p>4 A. Um-hum.</p> <p>5 Q. Are you familiar with the e-mail system there?</p> <p>6 A. Yes.</p> <p>7 Q. Do you use it yourself?</p> <p>8 A. Yes.</p> <p>9 Q. Would I be correct in saying that -- that workers</p> <p>10 there from time to time do use the e-mail system for</p> <p>11 personal use?</p> <p>12 A. We did, yes.</p> <p>13 Q. When you say "we did", what do you mean by that?</p> <p>14 A. We have a new policy.</p> <p>15 Q. Is that a new policy that came into effect when</p> <p>16 Mr. Lucht came in?</p> <p>17 A. Sometime after that, yes.</p> <p>18 Q. Prior to that, though, would I be correct in</p> <p>19 saying that it was not uncommon that e-mails would be sent</p> <p>20 outside the agency from workers?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Would they include e-mails to, for example,</p> <p>23 sell furniture? If they --</p> <p>24 A. Within the agency.</p> <p>25 Q. Within the agency. If they had something for</p>

<p style="text-align: right;">Page 42</p> <p>1 sale?</p> <p>2 A. Yes.</p> <p>3 Q. Would the workers also perhaps receive e-mails</p> <p>4 from friends or other people regarding material that had</p> <p>5 nothing to do with -- with work?</p> <p>6 A. Um-hum, yes.</p> <p>7 Q. That's not the policy anymore?</p> <p>8 MR. DEVLIN: I'm going to object. She didn't say</p> <p>9 it was the policy before. She said it occurred.</p> <p>10 Q. Occurred. But you said it was a change in</p> <p>11 policy -- or that that changed after Mr. Lucht came in?</p> <p>12 A. In regards to Internet stuff, yes.</p> <p>13 Q. The policy was always there, if I'm correct,</p> <p>14 right? There was always a written policy about the use of</p> <p>15 the computer system for --</p> <p>16 A. There's a County -- yes.</p> <p>17 Q. Okay. But that wasn't always strictly adhered to</p> <p>18 prior to Mr. Lucht. Would that be correct?</p> <p>19 MR. DEVLIN: Object to form. You can answer.</p> <p>20 A. Yes.</p> <p>21 Q. Do you remember making a statement that --</p> <p>22 something to the effect about the worst thing that P. did?</p> <p>23 A. Do I remember making that?</p> <p>24 Q. Yes. I guess that the agency doesn't know the</p> <p>25 worst thing that she did.</p>	
<p style="text-align: right;">Page 43</p> <p>1 A. I don't recall. I mean, anything that she did</p> <p>2 that I was aware of, I would report to my direct supervisor.</p> <p>3 Q. Okay. Are you familiar with an incident at K-Mart</p> <p>4 where P. -- or an allegation that P. slapped a child in</p> <p>5 K-Mart during visitation or anything like that?</p> <p>6 A. No.</p> <p>7 Q. Doesn't ring a bell?</p> <p>8 A. You're not ringing a bell.</p> <p>9 Q. Okay.</p> <p>10 (Discussion held off the record.)</p> <p>11 MR. ANGELONE: That's all I have.</p> <p>12 MS. BAUGH: I don't have any questions.</p> <p>13 MR. DEVLIN: No questions. We'll read.</p> <p>14</p> <p>15 (Testimony concluded at 2:44 p.m.)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

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